

## Tips on the Construction Permit Process

If you have submitted an air pollution construction permit application recently, or plan to submit one in the future, it may be helpful to understand the application review process at the Department of Natural Resources (DNR) Air Program.

### ***Assigning the Application***

When DNR receives an application, the Central Office in Madison tracks the date of receipt in a database.

The Construction Permit Team Leader checks with Air Program field staff to see if anyone close to your location, in either a service center or regional headquarters office, can review the application. If no one in

the regional offices has time to pick it up right away, then permit writers located in the Central Office are assigned the review. Applications are handled by the reviewer in the order they were assigned. Once the review begins, you should receive a letter either requesting additional information or indicating the application is complete. This may come weeks after the application is submitted due to the sheer number of applications assigned to staff at times.

### ***Speeding Up the Process***

Most of the permit writers in the field are very busy with Air Pollution Operation Permit reviews which still have a backlog. *(Continued on Page 7)*

### **What's New From the Small Business Clean Air Assistance Program...**

✓ ***DNR Contacts*** - a listing of DNR Air Program contacts in the regional offices, by task and by county (no longer listed on each fact sheet).

To order:  
call (608) 264-6153  
or (608) 267-9214;  
fax (608) 267-0436;  
or email [CleanAir@commerce.state.wi.us](mailto:CleanAir@commerce.state.wi.us)

## Still Working Out the Bugs...

You may have noticed the new format for the 2000 Small Business Clean Air Advisor Newsletters. If you also happened to notice that they both had "Spring 2000" in the title, then you are quite observant.

We're still working out the bugs. With the new format comes a different printing process. It is taking a few tries to get everything right. The learning curve has also delayed the normal quarterly cycle of these newsletters.

Yes, this year there were only two newsletters printed. You did not miss any. The cycle should resume its normal quarterly frequency in 2001.

We look forward to providing you with pertinent information to help you in your efforts to comply with the environmental regulations that apply in Wisconsin. If you have any questions or comments about the content of the newsletters feel free to contact the Small Business Clean Air Assistance Program via the methods listed on the back page.

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# Hot Topics in DNR's Air Program

Check them out at: [www.dnr.state.wi.us/org/aw/air/hot/index](http://www.dnr.state.wi.us/org/aw/air/hot/index)

In the past, the **Advisor** provided basic information about the 1-Hour Ozone Attainment Demonstration Plan (Plan) that was due from Wisconsin DNR to the US Environmental Protection Agency (EPA) by December 2000. This Plan was necessary to meet EPA's requirements for a complete State Implementation Plan (SIP). It was submitted to EPA in December and includes one new proposed rule that may affect small businesses located in the ozone nonattainment area.

## Industrial Cleaning Rule

A new RACT (Reasonably Available Control Technology) rule for Industrial Cleaning Operations was included in the Plan.

**For this rule *industrial cleaning* means: the process of cleaning products, product components, tools, equipment or general work areas during production, repair, maintenance or servicing with solvents or solvent solutions.**

## Applicability and Exemptions

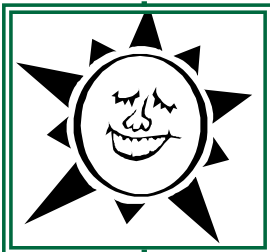
This regulation applies to sources with *industrial cleaning operations* in:

1. Kenosha, Milwaukee, Ozaukee, Racine, Washington or Waukesha counties, and whose maximum theoretical emissions (MTE) of volatile organic compounds (VOCs) are greater than 25 tons per year; or

2. Kewaunee, Manitowoc, or Sheboygan county and whose MTE of VOCs is greater than 100 tons per year.

**IMPORTANT:** For this rule, your MTE of VOC applies only to those VOCs that are not

already regulated by another VOC rule. To determine if this rule applies, you calculate:



1. Total MTE of VOCs from the whole facility, and

2. MTE of VOCs that are regulated by an existing VOC rule. [If you have a permit, look for one of these code citations after your permit conditions related to VOC emissions units: NR 419.05, 419.06, 419.08, anything under chapter NR 420, 421 or 422, or NR 423.03, 423.04, 423.05, 424.04 or 424.05 in the Wisconsin Administrative Code (Wis. Adm. Code).]

3. Then subtract the amount in #2 from the amount in #1.

The amount calculated in #3 must be greater than the applicability levels listed previously for this rule to apply.

**For assistance on calculating the MTE of VOCs for your facility, you can contact the Small Business Clean Air Assistance Program (SBCAAP). Staff will go over it with you or send you a fact sheet with some example calculations.**

There are also other exemptions that may apply to your industrial cleaning operations, even if your MTE of VOCs is greater than the applicability level. Some of those exemptions apply to only certain parts of the rule, not all.

## Requirements

If the rule does apply to you, then you have until January 1, 2002 to change your solvents to ones that meet the VOC content limits. The table on page 7 contains a list of the VOC content limits for the different processes that are considered industrial cleaning operations.

(Continued on page 7)

**Compliance Due  
January 1, 2002**

# Small Business Clean Air Assistance Enters the Internet Age

## **Why Use the Internet?**

More and more people use the Internet to obtain personal or business assistance. Until now, Wisconsin's Small Business Clean Air Assistance Program (SBCAAP) has had a limited amount of information available on the Department of Commerce web site.

As more small businesses find themselves needing to keep pace with the computer age, the SBCAAP wants to provide assistance at your fingertips at any time. One of the most accessible formats to receive/review information electronically on the web is from Adobe Acrobat, called Portable Document Format (PDF).

## **Free Software!**

Adobe's Reader is available **free** on the internet. Just download it from their web site and install it on your hard drive. Go to the Adobe web site at [www.adobe.com](http://www.adobe.com) and find the "Get Acrobat Reader" button. Follow that to the download page and download the program. Available for PCs or MACs, Acrobat Reader works on a wide range of operating systems (i.e., a version is available for Windows 3.1 for PCs).

**Get the Acrobat  
Reader at  
[www.adobe.com/](http://www.adobe.com/)**

## **What Documents Are Available?**

The box at the right shows a list of the fact sheets that we expect to have available in PDF on our web site soon. Other fact sheets might give you some insight on what to expect if your facility were to be inspected by the DNR's Air Program.

## **How To Get The Documents**

Our next edition will have all the step-by-step instructions on getting our fact sheets, the Publication Order Form and the *Advisor* electronically.

If you are interested in getting the Publication

### **List of SBCAAP Publications SOON TO BE AVAILABLE in Portable Document Format (PDF) on the Commerce website:**

- ✓ Clearing the Air on Environmental Consultants
- ✓ Clean Air Consultants
- ✓ Are You Aware of EPA's New Enforcement Policy? If Not...Learn About HPV.
- ✓ State Hazardous Air Pollutant Rule
- ✓ A DNR Air Program Inspector is Coming... What Can I Expect?
- ✓ Your Air Pollution Permit and the DNR's Public Comment Period
- ✓ Environmental Information Summary
- ✓ Air Pollution Permits for Small Businesses
- ✓ Air Pollution Operation Permits
- ✓ Air Pollution Construction Permits
- ✓ Combustion Sources and Construction Permits
- ✓ VOC Sources and Construction Permits
- ✓ Various RACT Fact Sheets
- ✓ Various MACT Fact Sheets

Contact us with other topics you'd like to see. ♦

Order Form or the **Advisor** Newsletter in PDF sooner by email, please send us an email at the following address:

**[CleanAir@commerce.state.wi.us](mailto:CleanAir@commerce.state.wi.us)**

We hope to get those fact sheets out on our web site very soon! **Let us know if there are other topics that you would like covered in a SBCAAP fact sheet.**

# DNR's Consolidated Reporting System

## Updates/Training on the CRS Program and Other Air Issues

The Federation of Environmental Technologists (FET) Milwaukee Chapter, Air Committee and the Wisconsin Department of Commerce, Small Business Assistance Program, and the Department of Natural Resources are once again sponsoring the Air Issues Update programs in January 2001.

The following topics are on the agenda:

- **ABC's of Air Pollution**
- **Consolidated Reporting System 2000 and Plans for 2001 and Beyond**
- **Air Permit Renewals**
- **DNR's Early Emission Reduction Program**
- **Asbestos in Your Workplace, Home and Schools**
- **Early Emissions Reduction Registry**
- **Revising DNR's Air Toxic Rule NR 445**

- **NR 445: The Nitty Gritty Details**
- **New MACT Rules and Regulatory Update**

Each session is scheduled from 8:00 am through 3:45 pm, with one hour for lunch. Registration will take place from 7:30 - 8:00 am if you attend the ABC's of Air Pollution topic or 8:45 - 9:00 am if you skip the ABC's.

The dates for the 2001 training is as follows:

January 16 in Madison  
January 18 in Milwaukee  
January 23 in Eau Claire  
January 24 in Wausau  
January 25 in Appleton

The one-day course will cost \$75 for each registrant. For a reservation form, contact FET at fet@hnet.net or 262/644-0070. ❖

## Electronic Compliance Assistance Resources

Electronic resources providing compliance assistance and pollution prevention information are constantly being developed by local, state and federal programs. It can be difficult to keep track of all these new resources unless you are watching their internet-based web sites daily. The SBCAAP will attempt to keep you apprised of new developments.

One good starting point is the **Small Business Environmental Home Page** at:

[www.smallbiz-enviroweb.org](http://www.smallbiz-enviroweb.org)

It has links to compliance assistance, pollution prevention, and other regulatory information of interest to small businesses. Check out the Industry Sector section. From there you will find links to the following **Compliance Assistance Centers**:

Auto Repair	<a href="http://www.ccar-greenlink.org">www.ccar-greenlink.org</a>
ChemAlliance	<a href="http://www.chemalliance.org">www.chemalliance.org</a>
Agricultural Center	<a href="http://www.epa.gov/oeca/ag">www.epa.gov/oeca/ag</a>
Metal Finishing	<a href="http://www.nmfrc.org">www.nmfrc.org</a>
Paints and Coatings	<a href="http://www.paintcenter.org">www.paintcenter.org</a>

Printed Wiring Board	<a href="http://www.pwbrc.org">www.pwbrc.org</a>
Printers	<a href="http://www.pneac.org">www.pneac.org</a>
Solvent Cleaning	<a href="http://clean.rti.org">clean.rti.org</a>
Transportation Resource	<a href="http://www.transource.org">www.transource.org</a>

**Enviro\$en\$e**, a site organized cooperatively by the EPA and industry, will have a sector-based approach, but is still under construction. Draft web pages currently exist for Metal Finishing, Petroleum Refining, and Printing. Coming soon to **Enviro\$en\$e** are the Electronics and Computer Industry and Food Processing pages. You can find them at:

<http://es.epa.gov/cooperative/topics/intro.html>

For information on the latest and developing air pollution control techniques, including low solvent materials, for both stationary sources as well as on- and off-road engines, check out NuTech. The site can be found at:

[www.nutech.org](http://www.nutech.org)

Keep your eye on this space for new links. ❖



# Wisconsin Focus on Energy

What do Sargento Foods, Louisiana-Pacific, Bellin Hospital and Brown County have in common? All of them have received recognition as Champions of Efficiency from reduced operating expenses and pollution. They, along with some 150 other business and organizations in Northeastern Wisconsin, have taken advantage of a unique pilot program - Wisconsin Focus on Energy.

Wisconsin Focus on Energy commercial and industrial programs are designed specifically to provide local governments, commercial organizations and industries with the information and resources they need to identify and implement energy efficiency projects. Participants are eligible for free services to assist in increasing the energy efficiency of their buildings and operations. Among the available services are:

- ⚙ energy surveys;
- ⚙ unbiased technical assistance on bids;
- ⚙ linkage to vendors who can help implement projects;
- ⚙ identification of other resources and programs available to help achieve energy saving goals; and
- ⚙ access to workshops and seminars on a broad range of energy efficiency topics.

Wisconsin Focus on Energy is a partnership created by the Wisconsin Department of Administration in coordination with the Public Service Commission of Wisconsin and the Wisconsin Public Service Corporation. The services provided by Wisconsin Focus on Energy are currently available to businesses, local governments and non-profit organizations in 23 counties of northeastern Wisconsin.

For more information you can contact them at 1-800-762-7077 or visit [www.wifocusonenergy.com](http://www.wifocusonenergy.com). ❖

# Council's Corner... Update on Green Tier

Members of the Small Business Environmental Council (SBEC) gathered other small business representatives to discuss the opportunities and barriers presented by proposed Green Tier legislation.

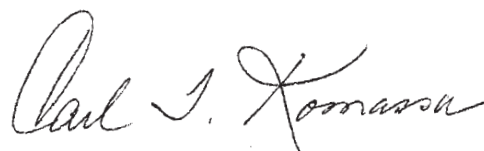
Green Tier is designed to be a voluntary system to recognize and encourage businesses to go beyond compliance, use an environmental management system (EMS), and includes specific criteria to determine which businesses are qualified to participate. For many small businesses it is often difficult to find the resources to achieve and maintain compliance. An extra effort to improve beyond compliance must make economic sense.

Some issues the small business representatives mentioned as their primary concerns -- or incentives -- for participation included:

- ✓ Recognition is beneficial if the program is well promoted so that it means something to your customers.
- ✓ Provide non-regulatory resources to help small business determine level of compliance and help them develop and implement an environmental management system.
- ✓ Promote how much time and money will be saved for businesses adopting this system, to show that the environmental benefit also makes economic sense.
- ✓ Recognize the need for a good balance of sufficient time for developing new processes to reduce adverse environmental impacts while maintaining quick response time to meet market needs.

You can review the latest documents from the Green Tier Advisory Committee at [www.dnr.state.wi.us/org/caer/ceal/green\\_tier/index.htm](http://www.dnr.state.wi.us/org/caer/ceal/green_tier/index.htm).

Sincerely,



Carl Komassa  
Quality Systems Manager, Beck Carton  
and Chair of the Small Business  
Environmental Council

# Recently Proposed MACT Standards

## Will You Be Affected?

The Environmental Protection Agency (EPA) sets standards to control hazardous air pollution through MACT standards as part of the 1990 Clean Air Act Amendments. MACT stands for Maximum Achievable Control Technology. MACT standards have been set by EPA for many different industry categories. The MACT requirements are based on the level of control achieved by the top 12% best controlled sources in each regulated industry.

### ***Municipal Solid Waste Facilities MACT***

On November 7, 2000, EPA proposed a MACT standard for both major and area source Municipal Solid Waste (MSW) facilities. A major source is an MSW with emissions of non-methane organic compounds (NMOC) greater than 100 Mg per year (100 tons per year). An area source is any that is not considered a major source. The hazardous air pollutants of concern from landfills are vinyl chloride, ethyl benzene, toluene, and benzene.

The MACT contains the same requirements as the Emission Guidelines and New Source Performance Standards (EG/NSPS) for MSW landfills. The MACT adds startup, shutdown, and malfunction (SSM) requirements, operating condition deviations for out-of-bounds monitoring parameters, and changes the reporting frequency for one type of report to the conditions in the EG/NSPS.

Smaller area sources may actually be exempt from any control requirements. No control is required of landfills smaller than 2.5 million Mg or 2.5 million m<sup>3</sup> capacity, or emit less than 50 Mg per year (50 tons per year) of NMOC. This cutoff level is meant to recognize that small businesses or municipalities can least afford the cost to control the NMOC emissions.

### ***Reinforced Plastic Composites***

The EPA will soon propose the MACT standard for the reinforced plastic composites industry, also known as fiber reinforced plastic (FRP). The rule is under review by EPA's Office of Management and Budget (OMB), which should be completed by the end of January at the latest. After the OMB review, the rule will be proposed in the Federal Register.

The draft MACT for reinforced plastic composites contains conditions that limit the amount of styrene content, in percent by weight, in the resins, based on the type of application equipment used. Some of the less efficient application methods may not be allowed under MACT. The newer application equipment has higher transfer efficiency of resin to the mold, allowing less resin to be used. Due to input from the Composites Fabricators Association, many changes were made on a previous draft MACT to assist small business.

**IMPORTANT:** If you determined that you would be exempt from Title V permit requirements using the old AP-42 emission factors from EPA, you will need to recalculate your emissions using NEW factors. AP-42 is a document published by EPA and contains emission factors for many industries. The AP-42 factors have been replaced by Unified Emission Factors for Open Molding of Composites developed by the Composites Fabricators Association.

If you already have a permit for either a synthetic or minor source, you should recalculate your emissions to ensure you are in compliance. You may also need to get a different type of permit if your newly calculated emissions make you a major source. There are pollution prevention options to help keep those emissions down.

Contact the SBCAAP for more details. ❖

## Tips on Permits... (cont. from Page 1)

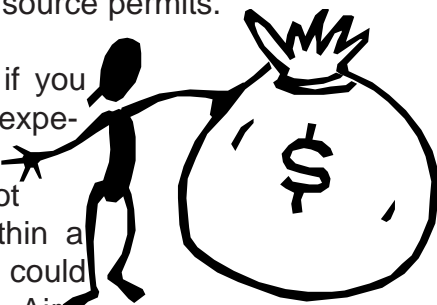
This means the Central Office permit writers end up doing the majority of construction permit reviews. Many of them work on numerous construction permit applications simultaneously.

You can request an expedited permit for a fee of \$2650. DNR permit staff work overtime on those requesting expedited review. The problem is that many small businesses cannot afford that extra money on top of the \$4000-8000 permit fee for most minor source permits.

What can you do if you don't apply for an expedited permit? If your permit has not been assigned within a couple weeks, you could contact the DNR Air Program field staff in your area to see if someone can work your permit into his or her schedule. The regional permit writer may have a new opening in their schedule since they were first approached about reviewing the application. Also, it's not a bad idea to make sure the application has not been misplaced. It's **rare**, but has happened. (Always keep a copy of an application for your files.)

If you really need to get your permit expedited but the total fee will be difficult to pay in one lump sum, DNR may be able to set up a payment plan. You will want to pay on time, because DNR could withdraw the permit if payment is not received within a reasonable period of time.

The best thing for you to do if you need to get your permit issued quickly is to talk with your contacts at the DNR. Contact the Small Business Clean Air Assistance Program by the methods listed on the back page to get a list of DNR regional contacts if you do not know who to contact or need updated information. ❖



## Hot Topics at DNR (cont. from Page 2)

There are other requirements, such as specific solvent application methods or equipment (whether application or control devices) as well as monitoring of leaks, storage and disposal procedures, recordkeeping and reporting.

Once this rule is final, the SBCAAP will develop a fact sheet on the requirements. Watch the "What's New" box on the front page of future issues of the **Advisor** to find out when it is available. ❖

Activity	VOC Content (lb/gal)
<b>* Product Cleaning</b>	
- General	0.42
- Electrical components	4.2
- Laminated wood (General/PVC)	3.8/5.8
- Medical devices and Pharmac.	6.7
- Screen printing	6.4
<b>* Repair and Maintenance</b>	
- General	0.42
- Electrical components	7.5
- Medical devices and Pharmac.	6.7
~ tool, equipment, machinery	5.0
~ general work surfaces	4.6
- Screen printing	4.6
<b>* Cleaning of application equipment (coating/adhesive)</b>	
- General	4.6
- Architectural coatings	7.9
- Ultraviolet coatings	6.7
<b>* Cleaning of application equipment (ink)</b>	
- General	0.42
- Flexographic	0.42
~ general	7.4
~ plastics, coated paper, metal foil	6.3
- Rotogravure	0.42
~ publication	6.3
~ packaging	0.42
- Lithographic or letterpress	(30% by wt)
~ on -press components	0.42
~ removable press components	6.4
- Screen Printing	6.7
- Ultraviolet ink (except screen printing)	6.7
<b>* Cleaning of application equipment (polyester resin)</b>	
	0.42

# Small Business Assistance Program Display

If your industry is affected by environmental regulations and you want an easy way to get environmental information out to your trade association members, the Small Business Clean Air Assistance Program (SBCAAP) can bring their display to you. The SBCAAP has a portable, table-top display that can be available for any trade shows or association conferences.

The display includes key environmental messages on the display board and fact sheet handouts provided on the table. The message can be set up to address your particular issue while multiple fact sheets will provide information on a wide range of environmental issues. Allow about six to eight weeks notice to ensure the display can be developed specific to your industry or trade group. New signs may need to be produced.

The SBCAAP staff are also available for presentations on what our program can provide for your

industry or trade group members or on specific environmental regulations. Just let us know what your goals are for your program and we can set our focus for either venue - a display, a presentation, or both.

Some of the regular events where SBCAAP presents the display includes: the Governor's Roundtable on Energy and the Environment; the Federation of Environmental Technologists (FET) Annual Conference; and the Keep Greater Milwaukee Beautiful Symposium on Business and the Environment. Other groups that we have presented or displayed for are the Wisconsin Fabricare Institute and the Wisconsin Automobile Collision Technicians Association, Ltd.

Contact Renée Lesjak Bashel as indicated below to schedule use of the display or a presentation, or both. ❖

## WISCONSIN DEPARTMENT OF COMMERCE

The Small Business Clean Air Advisor is published by the Wisconsin Department of Commerce, Brenda J. Blanchard, Secretary. To obtain free copies or to be placed on the mailing list, contact:

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